

C. DUKES SCOTT  
EXECUTIVE DIRECTOR

1401 Main Street, Suite 900  
Columbia, SC 29201



NANETTE S. EDWARDS  
DEPUTY EXECUTIVE DIRECTOR

Phone: (803) 737-0800  
[www.regulatorystaff.sc.gov](http://www.regulatorystaff.sc.gov)

[jnelson@regstaff.sc.gov](mailto:jnelson@regstaff.sc.gov)

*Jeffrey M. Nelson*  
*Chief Counsel & Director of Legal Services*

November 20, 2017

**VIA ELECTRONIC FILING**

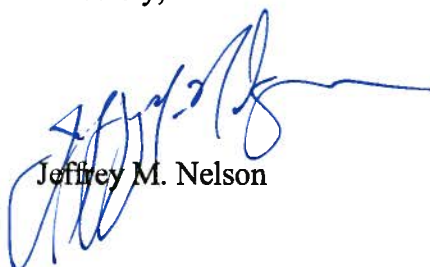
Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920  
**Docket No. 2017-305-E**

Dear Ms. Boyd:

By this letter, the South Carolina Office of Regulatory Staff ("ORS") hereby responds to the requests made by the Public Service Commission of South Carolina ("Commission") in its Order No. 2017-704, issued on November 8, 2017. Please find enclosed, ORS's preliminary list for stabilization and protection of the site containing V.C. Summer Units 2 and 3 (the "Site"). ORS believes that, pursuant to S.C. Code Ann. § 58-27-10 *et seq.*, the Commission has jurisdiction to require South Carolina Electric & Gas Company ("SCE&G") to take appropriate action. However, ORS respectfully submits that the Commission is in the best position to determine the breadth of its jurisdiction. ORS also suggests that the Commission have SCE&G respond to this letter, and explain why there is no violation of S.C. Code Ann. § 58-27-1300. Although ORS has no independent tax expertise, based on SCE&G's Allowable Ex Parte Briefing, held on November 9, 2017, and as explained by SCE&G, there is no certainty regarding the protection of the proposed abandonment tax deduction.

Sincerely,



Jeffrey M. Nelson

Enclosure

cc: K. Chad Burgess, Esquire (via US mail and E-Mail)  
Matthew W. Gissendanner, Esquire (via US Mail and E-Mail)  
Mitchell Willoughby, Esquire (via US Mail and E-Mail)  
Belton T. Zeigler, Esquire (via US Mail and E-Mail)  
Robert E. Tyson, Jr. (via US Mail and E-Mail)  
The Honorable Alan Wilson, Attorney General (via US Mail and E-Mail)  
Robert D. Cook, Esquire (via US Mail and E-Mail)  
J. Emory Smith, Esquire (via US Mail and E-Mail)  
Robert Guild, Esquire (via US Mail and E-Mail)  
Scott Elliott, Esquire (via US Mail and E-Mail)  
Stephanie U. Eaton, Esquire (via US Mail and E-Mail)  
Derrick Price Williamson, Esquire (via US Mail and E-Mail)  
Lara R. Brandfass, Esquire (via US Mail and E-Mail)  
Lynn S. Teague, Esquire (via US Mail and E-Mail)  
Frank Knapp, Jr., Esquire (via US Mail and E-Mail)  
Dino Teppara, Esquire (via US Mail and E-Mail)  
J. Blanding Holman, IV, Esquire (via US Mail and E-Mail)  
Elizabeth Jones, Esquire (via US Mail and E-Mail)  
Michael N. Couick, Esquire (via US Mail and E-Mail)  
Christopher R. Koon, Esquire (via US Mail and E-Mail)  
Frank R. Ellerbe, III, Esquire (via US Mail and E-Mail)  
John H. Tiencken, Jr., Esquire (via US Mail and E-Mail)  
Christopher H. McDonald, Esquire (via US Mail and E-Mail)  
Alexander G. Shissias, Esquire (via US Mail and E-Mail)  
Damon E. Xenopoulous, Esquire (via US Mail and E-Mail)  
Stephen R. Suggs, Esquire (via US Mail and E-Mail)  
John B. Coffman, Esquire (via US Mail and E-Mail)  
Dino Teppara, Esquire (via US Mail and E-Mail)  
Joseph Melchers, Esquire (via E-Mail)